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16 Attorneys for Defendants  
UBER TECHNOLOGIES, INC.  
17 and OTTOMOTTO LLC

18 UNITED STATES DISTRICT COURT  
19 NORTHERN DISTRICT OF CALIFORNIA  
20 SAN FRANCISCO DIVISION

21 WAYMO LLC,  
22 Plaintiff,  
23 v.  
24 UBER TECHNOLOGIES, INC.,  
OTTOMOTTO LLC; OTTO TRUCKING LLC,  
25 Defendants.  
26

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MICHELLE  
YANG IN SUPPORT OF PLAINTIFF  
WAYMO LLC'S ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL  
PORTIONS OF PARTIES' JOINT  
PRETRIAL FILINGS (DKT. 1724)**

1 I, Michelle Yang, declare as follows:

2 1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this  
3 declaration based upon matters within my own personal knowledge and if called as a witness, I  
4 could and would competently testify to the matters set forth herein. I make this declaration in  
5 support of Plaintiff Waymo LLC's Administrative Motion to File Under Seal Portions of Parties'  
6 Joint Pretrial Filings (Dkt. 1724).

7 2. I have reviewed the following documents and confirmed that only the portions  
8 identified below merit sealing:

Document	Portions to Be Filed Under Seal
Appendix A to Joint Proposed Pretrial Order	Entire Document
Appendix D to Joint Proposed Pretrial Order	Blue-Highlighted Portions

13 3. The entirety of Appendix A to the Joint Proposed Pretrial Order is a joint trial  
14 exhibit list that contains short descriptions of various documents. Even at a summary level, the  
15 list reveals confidential information regarding the technical development and features of Uber's  
16 LiDAR systems, as well as highly confidential business information regarding Uber's business  
17 agreements, including the identity of confidential vendors or potential vendors. This highly  
18 confidential information is not publicly known, and its confidentiality is strictly maintained.  
19 Disclosure of this information could allow competitors and counterparties to understand Uber's  
20 LiDAR development timeline and supplier strategy, which could harm Uber's competitive  
21 standing.

22 4. The blue-highlighted portions in Appendix D contain the confidential mailing  
23 address of a trial witness. Defendants request this information be kept sealed in order to protect  
24 this individual's privacy in this media-intensive case. Disclosure of this information could  
25 subject this individual to harm or harassment.

26 5. Defendants' request to seal is narrowly tailored to the portions of the Joint Pretrial  
27 Filings that merit sealing.

1 I declare under penalty of perjury that the foregoing is true and correct. Executed this  
2 25th day of September, 2017 in San Francisco, California.

3  
4 /s/ Michelle Yang

Michelle Yang

5  
6  
7 **ATTESTATION OF E-FILED SIGNATURE**

8 I, Arturo J. Gonzalez, am the ECF User whose ID and password are being used to file this  
9 Declaration. In compliance with General Order 45, X.B., I hereby attest that Michelle Yang has  
10 concurred in this filing.

11  
12 Dated: September 25, 2017

/s/ Arturo J. Gonzalez

ARTURO J. GONZALEZ